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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
January 18th, 2008

RE: DA-08-2678A, WC Docket No. 08-14 and Comp. Pol. File No. 851. Informal Objection to Section 63.71, January 2nd, 2008 Application of MCI Communications Services Inc. d/b/a Verizon Business Services to Discontinue the Provision of Service on March 1st, 2008

Dear Ms. Dortch:

I have been engaged by Mr. Phillip Lynn Garrett of Telex Americas to enter this objection on his behalf to the discontinuation of telex services provided by Verizon Business Service.

Verizon notes in their application, paragraph 4, that public convenience and necessity will not be impaired by this proposed service discontinuance because there are several alternative providers of telex services:

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), b(2)):
Verizon currently offers Telex service in all fifty states, the District of Columbia, and in Puerto Rico on a domestic interstate and international basis. Telex service allows subscribers to send real-time teletype messages. The public convenience and necessity will not be impaired by this proposed service discontinuance because there are several alternative providers of telex services in the United States.

What Verizon fails to inform you is that although there are several alternative providers of telex service, Verizon is (1) not allowing enough time to notify ship owners and customers at sea about the telex switch shutdown nor allowing enough time for the establishment and implementation of a new service and (2) Verizon is refusing to allow the telex numbers themselves to be assigned or transferred to an alternative provider of telex services.

Mr. Garrett / Telex Americas has telex customers engaged in the shipping and maritime business and these customers have published their telex numbers to ships at sea, numbering in the thousands. Premature decommissioning of the telex

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services means that these customers and their ships at sea are put at risk for safe ship routing, for notification to shore of ship and crew emergencies, for transmittal of cargo loading and unloading instructions, for notification of arrival and departure information, including compliance with all US Coast Guard Notifications in order for the ship to enter US water and ports, (eNOAD - electronic Notification of Arrival and Departure). Further, there are many commissioned ships that have not migrated their technology over to the latest internet and email interfaces and use telex for a majority of their communications.

It is vital to on-going ship commerce and safety that Verizon be prohibited from decommissioning these telex numbers less than six months from services termination notification. It is absolutely critical that the ships and ship owners be allowed at least six months before decommissioning the service in order to establish a new service and publish and implement the new telex numbers.

With regard to the telex numbers themselves, the porting, or transfer of the number to a new carrier, is commonplace and MCI/Verizon and International Carriers engage in the practice by customer request, merger or acquisition. Verizon is refusing to port or transfer a customer's existing telex number to a new carrier. Using the analogy of the phone number, this is like a customer's current phone service provider sending them a letter notifying them that they can no longer be their phone service provider and warning them that their phone service will be shut down. In this hypothetical example, not only is this phone service provider giving their customers too short of a time to notify all of their creditors, friends, and family, update any printed materials, and implement the new phone number, this phone service provider is also refusing to allow this customer to transfer their existing phone number to the new service provider.

Expand the effort for this hypothetical phone customer as a private phone subscriber in notifying all of their friends and family of their new phone number to a world-wide scale with customers currently at sea, ship owners, advertisements, instruction manuals, training, and brochures that need to be updated, in English and many other different languages. March 1st, 2008 is far too short of a time period for notification and implementation of a new telex number to the thousands of ships at sea, to the many International Ship Owners and Agencies worldwide, and in turn, to their own customers.

The exceedingly short notice before decommissioning coupled with Verizon's refusal to allow transfer of the existing telex number to a new carrier significantly burdens the shipping industry and those who provide the telex communications services.

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Therefore, Mr. Garrett requests a delay of the termination order to extend to at least August 1, 2008. Further, Mr. Garrett requests a directive to Verizon to allow transfer of their telex numbers to a new telex service provider.

If you have any questions, please contact Mr. Phil Garrett after Monday, January 21st, 2008.

Mr. Phil Garrett's Contact Information:

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Respectfully submitted,

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Attached: MCI Communications Services Inc. Section 63.71 and 63.19 Discontinuance Application

Copy to: Rashann Duvall, Counsel, Verizon